

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Niconnia M. Headen :  
Debtor : BANKRUPTCY NO.: 19-13636 amc

**RESPONSE TO MOTION FOR RELIEF**

Debtor, by her attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1.-2. Admitted.

3. Denied. Movant's averment refers to documents on record before the Court. The Debtor does attest to the authenticity or veracity of said documents. Said documents speak for themselves.

4. Denied. Movant's averment refers to documents on record before the Court. The Debtor does attest to the authenticity or veracity of said documents. Said documents speak for themselves.

5. Denied. The corresponding averments is denied to the extent that it contains conclusions of law to which no response is necessary.

6.-8. Denied. The Debtor has made payments, which are not reflected in the Movant's corresponding paragraph. By way of further response, should the Debtor owe any post-petition amounts, the Debtor intends to cure.

9. Denied. The averment set forth in these paragraphs are denied to the extent that it contains conclusions of law to which no response is necessary.

10. Denied. No cause for such relief exists.

11. The Movant's averment does not call for a response. To the extent Movant's averent contains any statements of fact, said facts are denied.

**WHEREFORE**, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 11/21/2019

/s/ Brandon J.Perloff  
Brandon J.Perloff Esquire.  
Attorney for Debtor